IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

M.A., an individual,)
Plaintiff,)
v.) CIVIL ACTION NO.: 2:19-CV-00849
WYNDHAM HOTELS & RESORTS, INC., et al.,)))
Defendants.	<i>)</i>)

JOINT MOTION TO SEVER AND DISMISS DEFENDANTS CHOICE HOTELS INTERNATIONAL, INC. AND BUCKEYE HOSPITALITY, LLC

Pursuant to Fed. R. Civ. P. 21, Plaintiff M.A. ("Plaintiff") and Defendants Choice Hotels International, Inc. and Buckeye Hospitality, LLC ("Defendants") (collectively, Plaintiff and Defendants are the "Parties") move the Honorable Court to sever Plaintiff's claims solely against Choice Hotels International, Inc. and Buckeye Hospitality, LLC and dismiss such claims with prejudice subject to the enforcement of the Parties' settlement agreement. Plaintiff has resolved her claims against the Defendants. Plaintiff and Defendants stipulate and agree that each party will bear their own costs.

Accordingly, the Parties hereby request that the Court sever and dismiss the Defendants from this matter, with prejudice, pursuant to Federal Rules of Civil Procedure 21. This dismissal shall not affect the claims asserted by Plaintiff against any other Defendant in this case.

Dated: February 28, 2023

Respectfully Submitted,

/s/ Steven C. Babin, Jr. (by email consent)
Steven C. Babin, Jr. (0093584)
BABIN LAW, LLC
22 East Gay Street, Suite 200
Columbus, Ohio 43215
steven.babin@babinlaws.com

Counsel for Plaintiff M.A.

Kimberly Lambert Adams (pro hac vice)
Kathryn L. Avila (pro hac vice)
Christopher V. Tisi (pro hac vice)
Hilary Wood (pro hac vice)
LEVIN, PAPANTONIO, RAFFERTY,
BUCHANAN, O'BRIEN, BARR &
MOUGEY, P.A.
316 S. Baylen Street, Suite 600
Pensacola, FL 32502
kadams@levinlaw.com
kavila@levinlaw.com
ctisi@levinlaw.com
hwood@levinlaw.com

Gregory M. Zarzaur (*pro hac vice*) ZARZAUR 2332 Second Avenue North Birmingham, Alabama 35203 gregory@zarzaur.com

Anil A. Mujumdar (pro hac vice) DAGNEY JOHNSON LAW GROUP 2170 Highland Avenue, Ste #250 Birmingham, Alabama 35205 anil@dagneylaw.com

Counsel for Plaintiff M.A.

/s/ Jennifer Snyder Heis

Jennifer Snyder Heis (#0076181) ULMER & BERNE LLP 312 Walnut Street, Suite 1400 Cincinnati, Ohio 45202-2409 jheis@ulmer.com

Sara M. Turner (pro hac vice)
BAKER, DONELSON, BEARMAN,
ALDWELL & BERKOWITZ, PC
420 North 20th Street, Suite 1400
Birmingham, Alabama 35203-5202
smturner@bakerdonelson.com

Kevin C. Connell BRUNS CONNELL VOLLMAR & ARMSTRONG 40 North Main Street, Suite 2010 Dayton, Ohio 45423 kconnell@bcvalaw.com

Attorneys for the Defendant Choice Hotels International Inc.

/s/ Jennifer George

Daniel T. Downey
Jennifer H. George
FISHEL, DOWNEY, ALBRECHT &
RIEPENHOFF LLP
7775 Walton Parkway, Suite 200
New Albany, Ohio 43054
ddowney@fisheldowney.com
jgeorge@fisheldowney.com

Counsel for Defendant Buckeye Hospitality, Inc.

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically February 28, 2023. Notice of this filing will be sent to all parties by operation of the Court's Electronic filing system. Parties may access this filing through the Court's system.

/s/ Jennifer Snyder Heis
Jennifer Snyder Heis (#0076181)